

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

United States of America
v.

TIMOTHY FARR

Case No. 3:24-mj-745

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 3 through 15, 2024 in the county of Montgomery and Clark in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1951(a)(1) x8

Interference with Commerce by Threats or Violence

18 U.S.C. § 924(c)(1)(A)(ii) x8

Using and Carrying a Firearm During and in Relation to a Crime of Violence

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Christopher M. Reed

Complainant's signature

SA Christopher M. Reed, ATF

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
Telephone _____ (specify reliable electronic means).

Date: December 18, 2024

City and state: Dayton, Ohio

Caroline H. Gentry
United States Magistrate Judge



AFFIDAVIT

I, Special Agent Christopher M. Reed (“Affiant”), being duly sworn, depose and state the following:

1. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews and reports by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

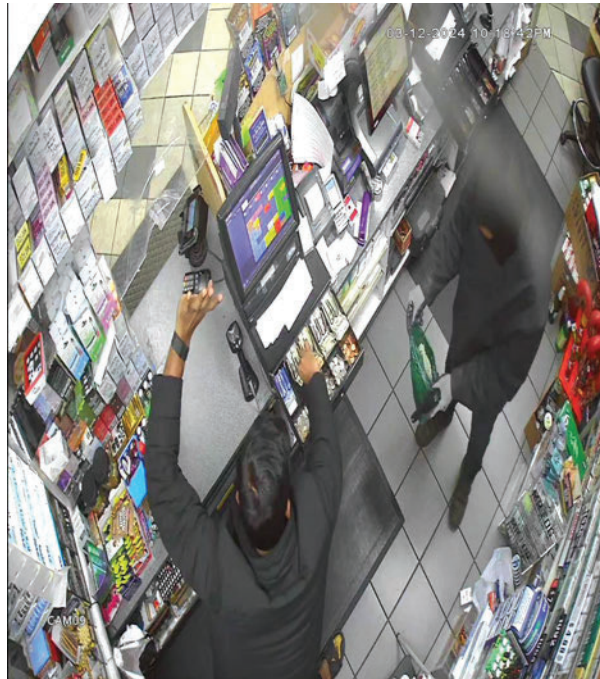
2. I am a Special Agent (“SA”) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been since May 2008. I am presently assigned to the ATF Columbus Field Division, Dayton Satellite Office. I attended formal training at the Federal Law Enforcement Training Center, where I completed the Criminal Investigator Training Program, and the ATF National Academy, where I completed Special Agent Basic Training. I have received additional training in the enforcement of various criminal statutes enacted in the Gun Control Act of 1968 and the National Firearms Act of 1934. Under 18 U.S.C. § 3051, I am empowered to enforce the criminal laws of the United States. Prior to my employment with ATF, I received additional law enforcement training at the Indianapolis Police Department’s Police Academy and served the Indianapolis Metropolitan Police Department for approximately (8) years as a uniformed officer, narcotics detective, and an ATF Task Force Officer.

3. I am currently investigating Federal violations committed by **Timothy Farr (“FARR”)**, namely, 18 U.S.C. § 1951(a)(1) – Interference with Commerce by Threats or Violence – and 18 U.S.C. § 924(c)(1)(A)(ii) – Using and Carrying a Firearm During and in Relation to a Crime of Violence.

4. Starting on December 3, 2024, through December 15, 2024, a black male individual, later identified as Timothy FARR, committed multiple armed robberies of businesses in the Southern District of Ohio. FARR wore similar clothing during each incident. He would enter the business, brandish a suspected firearm, and order employees to give him US currency from registers at each location.

5. On December 3, 2024, at approximately 10:17pm, a masked individual, believed to be FARR, entered the Sunoco gas station located at 1502 Wayne Avenue, Dayton, Ohio. I have reviewed the surveillance video from Sunoco for December 3, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark colored shoes and a black balaclava mask covering a portion of his face.

6. FARR enters Sunoco and walks through the store, attempting to appear like a normal customer. He then goes behind the counter, brandishes a black handgun, points it at the Sunoco employee and demands the cash from both registers. FARR also demands several packs of cigarettes and a box of Black and Mild Filter Tips. FARR opens a green plastic bag he appeared to have brought with him and orders the store employee to place the cash and cigarettes into the plastic bag. After receiving approximately \$785.00, several packs of Newport cigarettes, and a box of Black and Mild Filter Tips, he flees the store. The image below is a screen shot from the surveillance video I reviewed.



7. On December 4, 2024, at approximately 11:36pm, a masked individual, believed to be FARR, entered the Marathon gas station located at 4412 Linden Avenue, Riverside, Ohio. I have reviewed the surveillance video from Marathon for December 4, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark colored crocs-style shoes, a black balaclava covering his head, and a white N-95 style mask with yellow straps covering a portion of his face.

8. FARR enters Marathon and walks through the store, attempting to appear like a normal customer. He then goes behind the counter, brandishes a black handgun, points it at the Marathon employee and demands the cash from both registers. FARR opens a black plastic bag he appeared to have brought with him and orders the store employee to place the cash from the first register into the bag. FARR then orders the employee to open the second register which was empty. After receiving approximately \$1000.00, he orders the employee to the ground and flees the store. The image below is a screen shot from the surveillance video I reviewed.



9. On December 6, 2024, at approximately 6:45pm, a masked individual, believed to be FARR, entered Ray's Xenia Avenue Market located at 720 Xenia Avenue, Dayton, Ohio. I have reviewed the surveillance video from Ray's for December 6, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark colored crocs-style, a black beanie covering his head, and a white N-95 style mask with yellow straps covering a portion of his face.

10. FARR enters Ray's Market and walks through the store, attempting to appear like a normal customer. He then goes behind the counter, brandishes a black handgun, points it at the Ray's clerk and demands the cash from the register. FARR opens a white plastic bag he appeared to have brought with him and orders the store clerk to place the cash from the register into the bag. After receiving approximately \$774.00 he flees the store. The image below is a screen shot from the surveillance video I reviewed.



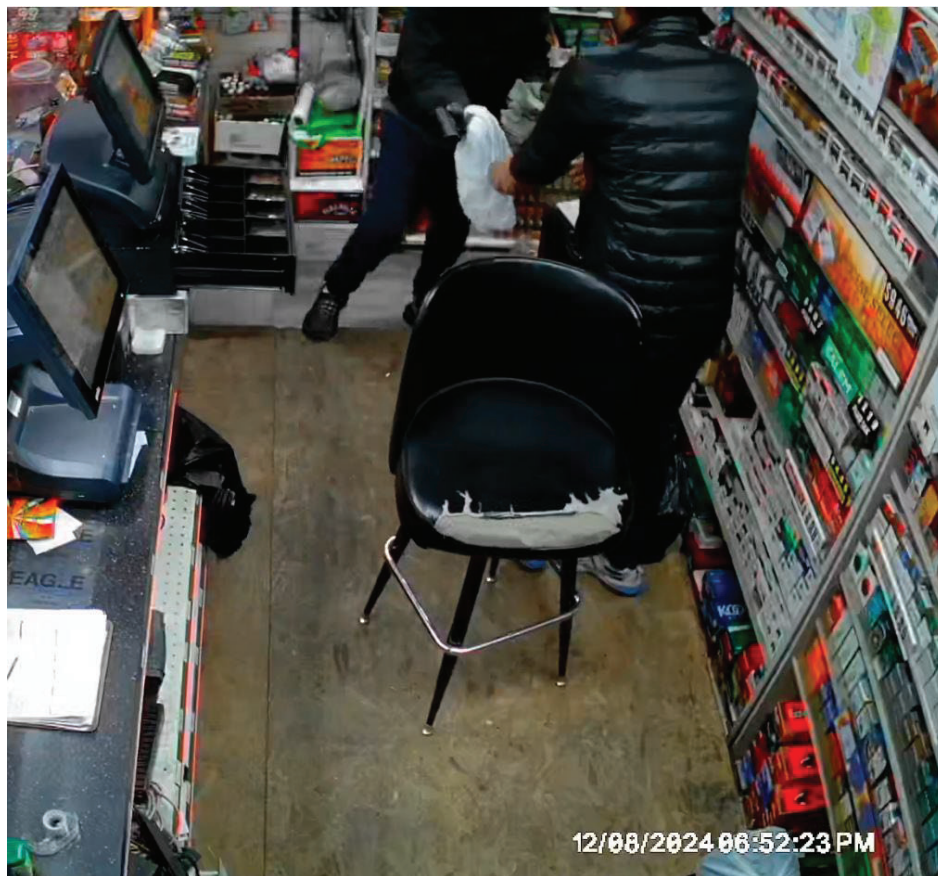
11. On December 7, 2024, at approximately 11:31pm, a masked individual, believed to be FARR, entered the Free Pike Drive-Thru located at 4053 Free Pike, Dayton, Ohio. I have reviewed the surveillance video from Free Pike Drive-Thru for December 7, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark colored crocs-style shoes, a black beanie style hat, and a white N-95 style mask with yellow straps covering a portion of his face.

12. FARR had walked into the North side of the drive through area of the business and asked the employee if they would serve people who walked through the business. After being told no, FARR walked further into the drive-thru area of the business, brandished a handgun, and pushed the employee to the back of the store where the cash registers were. FARR then orders the store employee to remove the money from the register and place it into the white plastic bag. After receiving approximately \$800.00, he flees the store. The image below is a screen shot from the surveillance video I reviewed.



13. On December 8, 2024, at approximately 6:40pm, a masked individual, believed to be FARR, entered the Sunoco Gas Station located at 1053 Selma Road, Springfield, Ohio. I have reviewed the surveillance video from Sunoco for December 8, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark colored crocs-style shoes, a black beanie covering his head, and a white N-95 style mask with yellow straps covering a portion of his face.

14. FARR enters Sunoco gas station and walks through the store, attempting to appear like a normal customer. He then goes behind the counter, brandishes a black handgun, points it at the store employee and demands the cash from the register. FARR then retrieves the money from the register and places it into the white plastic bag. FARR then orders the employee to grab several packs of Newport cigarettes and place them into the white bag. After receiving approximately \$500.00 to \$800.00 and several packs of Newport Cigarettes, he flees the store. The image below is a screen shot from the surveillance video I reviewed.



15. On December 10, 2024, at approximately 10:25pm, a masked individual, believed to be FARR, entered the Mini Mart store located at 1117 N. Main Street, Dayton, Ohio. I have reviewed the surveillance video from Mini Mart for December 10, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark

colored crocs-style shoes, a black beanie covering his head, and a white N-95 style mask with yellow straps covering a portion of his face.

16. FARR enters the Mini Mart and walks through the store, attempting to appear like a normal customer. He then goes behind the counter, brandishes a black handgun, points it at the employees and demands the cash from the registers. FARR opens a black plastic bag he appeared to have brought with him orders the store clerks to place the cash from the registers into the bag. After receiving approximately \$1000.00, he flees the store. The image below is a screen shot from the surveillance video I reviewed.



17. On December 11, 2024, at approximately 9:08pm, a masked individual, believed to be FARR, entered the Marathon gas station located at 1737 E. Fifth Street, Dayton, Ohio. I have reviewed the surveillance video from Marathon for December 11, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark colored crocs-style shoes, a black beanie covering his head, and a white N-95 style mask with yellow straps covering a portion of his face.

18. FARR enters the Marathon Gas station and walks through the store, attempting to appear like a normal customer. He then goes up to the counter, brandishes a black handgun, points it at the employee and demands the cash from the register. FARR opens a white plastic bag he appeared to have brought with him and orders the store clerks to place the cash from the register into the bag. After receiving approximately \$488.00, he flees the store. The image below is a screen shot from the surveillance video I reviewed.



19. On December 15, 2024, at approximately 9:08pm, a masked individual, believed to be FARR, entered the Sammy's Drive-thru store located at 1290 Woodman Drive, Dayton, Ohio. I have reviewed the surveillance video from Sammy's for December 15, 2024. The surveillance video shows FARR wearing a dark colored jacket, dark colored pants, gray two-tone style gloves, dark colored shoes, a black balaclava covering his head, and a white N-95 style mask with yellow straps covering a portion of his face.

20. FARR enters Sammy's and walks through the store, attempting to appear like a normal customer. He then goes behind the counter, brandishes a black handgun, points it at the employee and demands the cash from the register. FARR opens a white plastic bag he appeared to have brought with him and orders the store clerk to place the cash from the register and several packs of Newport cigarettes into the plastic bag. FARR and the employee then move to the second register. The employee places the cash from the second register along with two pairs of wireless earphones from the store shelf into the plastic bag. After receiving approximately \$400.00 and the other items, he flees the store. The image below is a screen shot from the surveillance video I reviewed.



21. During the investigation, law enforcement was able to identify a vehicle of interest utilizing the Flock Safety Camera System. The vehicle, identified as a 2011 red Ford Taurus bearing license plate number KJD7246, was captured by Flock cameras as being in the area around the time of several robberies. KJD7246 was checked through another accessible camera system that placed the vehicle near 719 Kammer Avenue Dayton, Ohio on or about November 24, 2024.

22. Further investigation of the vehicle revealed the 2011 red Ford Taurus was used in a theft offense from a Walmart located at 1701 W. Dorothy Lane, Moraine, Ohio, on November 26, 2024. Walmart surveillance cameras were able to capture an unknown black male subject load suspected stolen items into the red Taurus. Surveillance cameras were also able to capture a clear image of the suspected shoplifter.

23. Law enforcement was able to cross reference names through a police database of individuals associated with 716 Kammer Avenue and identified FARR. Dayton Police Detective Justin Ellis compared FARR'S booking photograph, BMV photograph against the video from the Moraine Walmart theft suspect and concluded they were similar in appearance. On December 16, 2024, at approximately 12:00pm, Detective Ellis observed the red Ford Taurus parked behind the 716 Kammer Avenue residence.

24. On December 16, 2024, Dayton Police Officer Sean Gallagher was on patrol when he observed the 2011 red Ford Taurus, Ohio license plate KJD7246, driving west on Third Street from Brooklyn Avenue. The vehicle had window tint that prevented the officer from being able to see inside of the vehicle along with a loud exhaust. Due to the violations, Officer Gallagher initiated a traffic stop on the vehicle at the intersection of West Third Street and South Upland Avenue. The officer approached the vehicle from the passenger side and spoke with the vehicle's

occupants. The driver was identified as Roger Gullatte III and front seat passenger as Timothy FARR.

25. As the officer spoke with FARR, the officer noticed he was wearing black Croc shoes, a black jacket and had an N-95 mask on the floorboard next to his feet. Officer Gallagher recalled that FARR'S attire, and the N-95 mask, fit the description of an aggravated robbery suspect he previously received information about. When Officer Gallagher asked the occupants if there were any guns or drugs in the vehicle, Gullatte responded "no" and FARR did not respond.

26. Officer Gallagher had FARR exit and place his hands on top of the vehicle. When Officer Gallagher asked FARR if he had anything on him, FARR stated that he had a pistol in his waistband. The officer removed the firearm and secured FARR. The firearm was later identified as a Walter, model PPQ, 9mm pistol. Officer Gallagher also located a gray pair of gloves in FARR's left jacket pocket. The gloves appeared to be consistent in appearance to the gloves used during the armed robberies. The image below is photograph I took of the gloves removed from FARR's jacket pocket.



27. After additional units arrived on scene, Gullatte and FARR were transported to Dayton Police Safety building located at 335 W. Third Street, Dayton, Ohio to be interviewed. Both Gullatte and FARR declined to be interviewed and requested an attorney.

28. Affiant asserts that each of the commercial businesses listed in the affidavit has engaged in interstate commerce and was an industry that affects interstate commerce. As a result of FARR's actions, interstate commerce, or an item moving in interstate commerce, was actually or potentially delayed, obstructed, or affected in any way or degree.

29. Based on the aforementioned facts, Affiant asserts that there is probable cause to believe that between December 3, 2024 and December 15, 2024, in the Southern District of Ohio, FARR did commit the following federal offenses: 18 U.S.C. § 1951(a)(1) – Interference with Commerce by Threats or Violence – and 18 U.S.C. § 924(c)(1)(A)(ii) – Using and Carrying a Firearm During and in Relation to a Crime of Violence.

Further affiant sayeth naught.

CHRISTOPHER REED Digitally signed by
CHRISTOPHER REED
Date: 2024.12.18
15:06:26 -05'00'

Christopher M. Reed
Special Agent, ATF
Dayton, Ohio

By telephone
Subscribed and sworn to before me on December 18, 2024.


Caroline H. Gentry
United States Magistrate Judge

